



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services Anchorage
605 West 4th Avenue, Room 62
Anchorage, Alaska 99501

ALASKA DEPT. OF
FISH & GAME

FEB 06 1996

HABITAT
DIVISION

IN REPLY REFER TO:

WAES

FEB - 1 1996

Mr. Joseph Yarzebinski, CED
Heritage Land Bank
P.O. Box 196650
Anchorage, Alaska 99519-6650

Dear Mr. Yarzebinski:

We have reviewed the draft Request for Proposal (RFP) dated December 13, 1995, for the Girdwood Golf Course/Nordic Ski Course and related recreation, commercial, and residential development on municipal land in Girdwood, Alaska and have the following comments. In addition, we are providing information on fish and wildlife resources and addressing concerns relating to the potential project impacts on fish and wildlife and their habitats.

The project study area encompasses approximately 536 acres. Golf course and nordic ski course development within the study area will not exceed 230 acres and no more than 40 acres will be available for related commercial/residential development.

General Comments

Very little fish and wildlife resource information is available for the project study area. We believe wetlands, fish, and wildlife resource information should have been obtained prior to writing the RFP to identify the most important habitat areas that should be avoided. Otherwise the ability to evaluate environmental protection and integration in the proposals could be extremely difficult. However, we are concerned that the proposed project could result in significant adverse impacts to fish and wildlife because of its large size, its potential to spur future development in adjacent areas, and the high resource values of the site.

Habitat

Glacier Creek Drainage, including California Creek and Virgin Creek Tributaries are high value habitat for a variety of plants, fish, and wildlife. The drainage is extremely productive because of its mix of forest, river, and wet meadow habitats. The floodplain of Glacier Creek consists of temporarily flooded deciduous forest and shrubs, mixed with cottonwood, alder, and willows; shrubs line the banks of the creek channels at slightly lower elevations than forested areas.

The mixed spruce hemlock forested areas are particularly unique. The hydrological is such

that these areas may be classified as forested wetlands and the stands of hemlock are at the northern portion of their range. Wetlands within the project study area could be much larger than indicated by the National Wetlands Inventory (NWI) and the Anchorage Wetlands Management Plan (April 1995) because of the lack of ground truthing on the site, the difficulty of being able to determine forested wetlands from aerial photographs, and outdated methods when the NWI mapping was done.

The majority of the wetlands mapped in the project study area are identified as "A" (preservation) wetlands in the Anchorage Wetlands Management Plan. "A" wetlands are generally not to be developed, cleared, or otherwise altered..." (January 7, 1986, Special Notice, Army Corps of Engineers, Alaska District). Some "C" wetlands (developable) are located in the northeast section of the study area.

The wetlands located east of Glacier Creek are saturated shrub/emergent wetlands, supporting sweet gale, alder, dwarf birch, labrador tea, bog blueberry, and various species of willow, mixed with bluejoint grass, horsetail, cow parsnip, helebore, rush, and sedges.

At the confluence of Glacier and Virgin creeks, saturated shrub/emergent wetlands mix with pockets of seasonally flooded emergent marshes. Standing water results from stream overflow early in the growing season supporting Sitka spruce, beaked and water sedges, marsh horsetail, bluejoint grass, marsh cinquefoil, marsh peavine, and sphagnum moss.

The various wetland types in the Girdwood valley serve many functions that include providing food and habitat to fish and wildlife, contributing to groundwater recharge, and temporarily storing flood waters which protect downstream properties and structures from flood damage. Flood storage functions also help slow water velocity, which reduces downstream erosion. Hydrology plays a dynamic role in this area, connecting a variety of habitats that depend on its contiguous influence.

Fish

Glacier Creek supports chinook, sockeye, coho, pink, and chum salmon and resident populations of Dolly Varden. Rainbow trout have also been reported, but remain unconfirmed. California Creek supports chinook, sockeye, chum, pink, and coho salmon as well as resident populations of Dolly Varden. Virgin Creek supports resident Dolly Varden and may also support salmon species. Little information is available regarding the location of rearing and spawning habitats for anadromous fish.

Birds

Limited information is available regarding bird abundance, type, and habitat use in the project area. Year round birds include bald eagle, great horned and boreal owl, spruce grouse, Steller's and gray jay, black-billed magpie, pine grosbeak, pine siskin, redpoll, 3 species of chickadee, downy, hairy, and northern three-toed woodpecker, red-breasted nuthatch, and brown creeper.

Potential Fish, Wildlife, and Wetland Impacts

The lack of resource information in the study area and the fact that detailed project plans are not yet available makes it difficult to evaluate project impacts on fish, wildlife, and wetlands. Generally speaking we believe the project could have significant impacts on wetlands, fish, and wildlife for the following reasons.

The project could significantly alter the landscape resulting in habitat losses to plants, fish, birds, and mammals. Habitat losses include breeding and resting areas, food sources, migration routes, and protective cover from predation and climatic conditions. Roads and other development may increase fragmentation, resulting in the disruption of wildlife travel corridors, increased competition between different species, and increased predation. The project is located in an area where stream and wetland hydrology is intricately connected and loss of habitat and disruption of one area could easily impact adjacent areas.

The project could result in the destruction of migratory bird nests. The destruction of active bird nests (i.e. those with eggs or young) is prohibited under the Migratory Bird Treaty Act (16 U.S.C. 703), and can best be avoided by conducting land clearing and fill activities before birds have established nest sites or after young have fledged.

Furthermore, we are concerned that future developments facilitated by this project will result in far-ranging cumulative impacts to fish and wildlife and their habitats. This project and future development could significantly reduce the amount and diversity of habitat available to fish and wildlife, resulting in major, long term habitat losses.

Preliminary Recommendations to Avoid and/or Minimize Resource Impacts

Since little fish and wildlife resource information is available and wetland mapping is incomplete, it is vitally important that this information be obtained as soon as possible so that development can be directed toward the least valuable fish and wildlife habitat. We may be able to assist with these studies. Information we recommend obtaining includes the following:

1. Document abundance, distribution, and habitat uses of fish and wildlife resources in the project study area.
2. Identify locations, types, and acreage of habitat, including wetlands, to be impacted by the project. It is important that potential wetland areas not yet mapped be ground truthed because of the difficulty in identifying forested wetlands from aerial photographs.
3. Identify location of eagle nest(s) within or adjacent to the project area.

In order to adequately assess if feasible alternatives to avoid wetland fill under the 404 Clean Water Act regulations are available, we believe the project area should not necessarily be limited by its current boundaries. However, development should be clustered in areas already

impacted by human development like the Alyeska Lodge and the Prince Hotel in order to avoid habitat fragmentation.

To prevent the destruction of active migratory bird nests we recommend that land clearing and wetland fill activities not occur during nesting season (approximately April 15-July 15).

To avoid taking bald eagles, we recommend that loud or disturbing activities not occur near (within 660 feet of) all nest sites from March 15 to June 1 and from June 1 to August 31 for active eagle nests. Activities near active nests prior to August 31 may cause the young to prematurely attempt to fly from the nest and likely die from malnutrition, exposure, or predation. Blasting should not occur within ½ mile of an eagle nest during the nesting season.

To prevent impacts to stream habitat resources, streams should be adequately buffered from development. The use of chemical pesticides and fertilizers should be restricted or limited to avoid degrading water quality.

We will provide additional suggestions to avoid and minimize resource impacts when further details of the project become available.

Specific Comments

Page 14, Scope of Work

The necessary state and federal permits needed to develop this area and appropriate environmental laws and regulations should be included in this section.

Page 24, Environmental Protection and Integration

The ability for the developer to identify fish and wildlife habitat and unmapped wetlands in the project study area should be included in this section.

Information Brochure #12 Fish and Wildlife

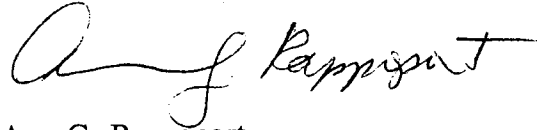
It is important to point out in this section that information regarding the type of fish and wildlife and their use of the habitat within the study area is limited. Since very few surveys have been done, it should be made clear to any prospective developer that additional resource information must be obtained as soon as possible to facilitate planning and avoid potential conflicts with important fish and wildlife habitat.

Information Brochure # 14 Local Public Agencies & Agency Contact Information

Please include U.S. Fish and Wildlife in these sections.

We appreciate the opportunity to provide comments to you during this early stage of the planning process. We are willing to discuss our comments further. We may be able to assist in gathering wetland and fish and wildlife resource information. Please contact Marcia Heer at (907) 271-2440 for more information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann G. Rappoport". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ann G. Rappoport
Field Supervisor

cc: MOA
ADF&G
EPA
COE
NMFS